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*Attorney for Defendant*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
Plaintiff,  
JONATHAN RISSE-SANTOS,  
Defendant.

CASE NO: 2:21-mj-00283-EJY

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
**(Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the United States of America, and Daniel F. Lippmann, Esq., counsel for Defendant, JONATHAN RISSE-SANTOS, that the preliminary hearing presently scheduled for August 13, 2021, be vacated and continued to a time convenient to the Court but no sooner than 60 days.

This Stipulation is entered into for the following reasons:

1. Counsels for the United States and Mr. Risse-Santos are in active negotiations and require more time to present and consider offers of resolution.
  2. To aid in these negotiations, counsel for Mr. Risse-Santos, has recently procured the services of a psychiatrist to prepare an evaluation. The psychiatrist will need additional time to review the discovery and conduct a proper interview with Mr. Risse-Santos and ultimately prepare a report.

- 1       3. Daniel F. Lippmann will not have sufficient and adequate time to effectively and
- 2                  thoroughly prepare for preliminary hearing and present an appropriate defense in the
- 3                  above-captioned matter on the date currently set for preliminary hearing.
- 4       4. Mr. Risse-Santos is in custody and does not object to the continuance.
- 5       5. Furthermore, denial of this request for continuance could result in a miscarriage of justice.
- 6       6. The parties agree to the continuance.
- 7       7. This is the third request for a continuance.

8                  The additional time requested by this stipulation is excludable in computing the time  
9                  within which the defendant must be indicted and the trial herein must commence pursuant to the  
10                 Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18  
11                 U.S.C. § 3161(h)(7)(B)(i) and (iv).

12                 DATED this 22<sup>nd</sup> day of July, 2021

13                 \_\_\_\_\_  
14                 s/Bianca R. Pucci  
15                 BIANCA R. PUCCI, ESQ.  
16                 Assistant United States Attorney

17                 \_\_\_\_\_  
18                 s/Daniel F. Lippmann  
19                 DANIEL F. LIPPmann, ESQ.  
20                 Nevada Bar No. 11636  
21                 *Attorney for Defendant*

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2                   **UNITED STATES DISTRICT COURT**  
3                   **DISTRICT OF NEVADA**

4                   UNITED STATES OF AMERICA,    }  
5                   Plaintiff,    }  
6                   JONATHAN RISSE-SANTOS,    }  
7                   Defendant.    }  
8  
9  
10

11    CASE NO: 2:21-mj-00283-EJY

12    **ORDER**

13    Based on the Stipulation of counsel, good cause appearing therefore:

14    IT IS HEREBY ORDERED that the Preliminary Hearing currently scheduled on August  
15    13, 2021, be vacated and continued to October 22, 2021 at the hour of 10:00 a.m., in Courtroom  
16    3D.

17    DATED this 26th day of July, 2021.

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19    Elayna J. Youschah  
U.S. Magistrate Judge